

FILED

MAY 13 2021

PATRICK KEANEY
Clerk, U.S. District Court

By _____
Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAULA AMBER CHISHOLM,

Defendant.

Case No.

CR 21-194 RAW

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

CHILD ABUSE IN INDIAN COUNTRY
[18 U.S.C. §§ 1151, 1153 & 21 Okla. Stat. § 843.5(A)]

Beginning on or about November 20, 2019 and continuing until December 5, 2019, within the Eastern District of Oklahoma, in Indian Country, the defendant, **PAULA AMBER CHISHOLM**, an Indian, did willfully and maliciously cause and threaten harm to the health, safety, and welfare of K.C., a child under the age of eighteen, by striking, kicking, dragging, pinching, and restraining K.C., in violation of Title 18, United States Code, Sections 1151, 1153, and Title 21, Oklahoma Statutes, Section 843.5(A).

COUNT TWO

CHILD NEGLECT IN INDIAN COUNTRY
[18 U.S.C. §§ 1151, 1153 & 21 Okla. Stat. § 843.5(C)]

Beginning on or about September 1, 2019 and continuing until December 5, 2019, within the Eastern District of Oklahoma, in Indian Country, the defendant, **PAULA AMBER CHISHOLM**, an Indian, did willfully and maliciously fail and omit to provide adequate


nurturance, affection, food, sanitation, and hygiene for K.C., a child under the age of eighteen, all while defendant was responsible for the health, safety and welfare of K.C., in violation of Title 18, United States Code, Sections 1151, 1153, and Title 21, Oklahoma Statutes, Section 843.5(C).

A TRUE BILL:

CHRISTOPHER J. WILSON
Acting United States Attorney

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

s / Foreperson
FOREPERSON OF THE GRAND JURY



MORGAN MUZLJAKOVICH, OBA #32852
Assistant United States Attorney